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15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN JOSE DIVISION

18 CISCO SYSTEMS, INC.,

19 Plaintiff,

20 v.

21 ARISTA NETWORKS, INC.,

22 Defendant.

Case No. 5:14-cv-05344-BLF (PSG)

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF  
DEFENDANT ARISTA NETWORKS,  
INC.'S MOTION TO COMPEL  
DISCOVERY RESPONSES**

Date: July 12, 2016  
Time: 10:00 a.m.  
Place: Courtroom 5, 4<sup>th</sup> Floor  
Judge: Hon. Paul S. Grewal

Date Filed: December 5, 2014

Trial Date: November 21, 2016

1 I, Eduardo E. Santacana, declare:

2 1. I am an attorney licensed to practice law in the State of California and am an  
3 attorney with the law firm of Keker & Van Nest LLP, located at 633 Battery Street,  
4 San Francisco, California 94111, counsel for Defendant Arista Networks, Inc. (“Arista”) in the  
5 above-referenced action. Unless otherwise stated, the facts I set forth in this declaration are based  
6 on my personal knowledge or knowledge I obtained through my review of corporate records or  
7 other investigation. If called to testify as a witness, I could and would testify competently to such  
8 facts under oath.

9 2. I submit this declaration in support of Arista Network’s Motion to Compel  
10 Discovery Responses and Production of Documents.

11 3. Attached hereto as **Exhibit A** is a true and correct copy of Defendant Arista  
12 Networks, Inc.’s Sixth Set of Interrogatories to Plaintiff Cisco Systems, Inc. (Nos. 21-25), dated  
13 March 30, 2016.

14 4. Attached hereto as **Exhibit B** is a true and correct copy of an excerpt of Plaintiff  
15 Cisco Systems, Inc.’s Objections and Responses to Arista Networks, Inc.’s Sixth Set of  
16 Interrogatories (Nos. 21-25), dated May 9, 2016.

17 5. Attached hereto as **Exhibit C** is a true and correct copy of correspondence from  
18 Ryan K. Wong, counsel for Arista Networks, Inc., to counsel for Cisco Systems, dated May 12,  
19 2016.

20 6. Attached hereto as **Exhibit D** is a true and correct copy of an excerpt of Plaintiff  
21 Cisco Systems, Inc.’s Supplemental Objections and Responses to Defendant Arista Networks,  
22 Inc.’s Interrogatories (Nos. 21, 24, & 25), dated June 3, 2016.

23 7. Attached hereto as **Exhibit E** is a true and correct copy of the Eighth  
24 Supplemental version of Exhibit F to Plaintiff Cisco Systems, Inc.’s Response to Interrogatory  
25 16, dated April 3, 2016.

26 8. On June 3, 2016, I participated in a meet and confer telephone conference with  
27 counsel for Cisco. During that conference, I reiterated Arista’s position that Cisco’s responses to  
28 Interrogatories 24 and 25 are inadequate, and I explained that Arista would be forced to move to

1 compel responses if Cisco did not change its position. Later that day, counsel for Cisco  
2 confirmed in writing that Cisco would stand on its objections to responding fully to  
3 Interrogatories 24 and 25.

4 Executed June 3, 2016, at San Francisco, California.

5 I declare under penalty of perjury under the laws of the United States of America that the  
6 foregoing is true and correct.

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EDUARDO E. SANTACANA